

Submission to the  
Senate Education  
and Employment  
Legislation  
Committee

January 2026



THE UNIVERSITY OF  
MELBOURNE

# Universities Accord (Australian Tertiary Education Commission) Bill 2025

## Executive Summary

The University of Melbourne (the University) welcomes the opportunity to contribute to this inquiry by the Senate Education and Employment Legislation Committee into the *Universities Accord (Australian Tertiary Education Commission) Bill* and the associated Consequential and Transitional Provisions Bill.

The Accord set an ambitious agenda for the future of higher education in Australia at a time when the demands on universities – and expectations from students, our community and Government – continue to grow and resources are under pressure. With large-scale enrolment growth and internationalisation, the higher education system has outgrown its current system arrangements.

Achieving system-wide reform demands a united effort, with constructive engagement between government, higher education experts and institutions. This is a pivotal moment in higher education, with the Accord recommending an Australian Tertiary Education Commission (ATEC) to provide wise counsel to government, stewardship of the sector and to deliver fair and sustainable funding arrangements to open access, drive differentiation and ensure institutional sustainability.

ATEC must be established with a remit to reimagine the system based on a shared vision for what the nation wants from its higher education system, with evidence-based stewardship centred on system sustainability, accessibility, quality, and integrity. It will need expert staff able to produce the high-quality advice needed by government and the sector.

The University supports the establishment of an ATEC that can deliver on this vision. However, there are fundamental aspects of its functions that are not yet sufficiently provided for in the Bill. Changes are needed to ensure that ATEC is:

- statutorily independent
- sufficiently resourced to deliver its mission
- enabled to develop deep expertise to provide evidence-informed analysis
- equipped to steward differentiation and specialisation across the sector
- collegiate rather than coercive in its relationship with the sector
- empowered to carry out a sophisticated costing function
- required to also provide advice in relation to higher education research and research training policy.

To facilitate this remit, the University proposes amendments to the Bill that would:

- allow ATEC to initiate inquiries and develop and publish policy reports and recommendations without specific Ministerial direction or veto
- establish a more decisive statutory separation of the ATEC from the management structures of the Department of Education and the Minister
- increase the number of full-time Commissioners, and empower the ATEC with absolute discretion to employ and maintain its own staff with knowledge of higher education.

This once-in-a-generation reform requires bold and courageous thinking to design an ATEC that becomes a national asset to Australia's economic and social wellbeing.

For further information or to discuss this submission, Acting Vice-Chancellor Professor Michael Wesley can be contacted on [vc@unimelb.edu.au](mailto:vc@unimelb.edu.au).

## Recommendations

### Recommendation 1:

Bolster ATEC's independence by:

- i. Explicitly granting ATEC authority to initiate inquiries and make and publish policy reports with recommendations without specific Ministerial direction or veto.
- ii. Establishing a more decisive statutory separation of the ATEC from the management structures of the Department of Education and the Minister, including that ATEC has sole discretion in its recruitment.
- iii. Ensuring the ATEC Commissioner has ultimate authority over Annual Report content.

### Recommendation 2:

Ensure ATEC is resourced to achieve its mission by:

- i. Providing for the Minister to appoint additional Commissioners.
- ii. Ensuring that the definition of "appropriate independence" does not exclude eminent people with recent high-level experience in tertiary education from being eligible to be appointed as a Commissioner. For part-time Commissioner roles, allow current relationships to the tertiary sector, as long as the part-time Commissioner declares these and recuses themselves from any decisions which specifically affect entities with which they have a relationship.
- iii. Providing ATEC with sufficient staffing budget and autonomy on all hiring decisions.
- iv. Enabling ATEC to take on secondments, short-term placements and policy fellowships from the sector, with sole discretion on selection and recruitment.
- v. Requiring the establishment of a Threshold Standards advisory committee which includes members with relevant expertise drawn from the sector.

### Recommendation 3:

Expand ATEC's functions so it can more actively assist universities to differentiate and specialise, including affording it the authority to allocate structural adjustment funding, or to provide advice to the Minister on its allocation.

### Recommendation 4:

Encourage an ATEC that works collegiately with the sector by:

- i. Ensuring that a default compact must include the same terms that were in the most recent mission based compact.
- ii. Defining "national sector stewardship" in the legislation in a way that makes clear that ATEC does not have a regulatory relationship with the sector.

### Recommendation 5:

Empower ATEC to carry out a sophisticated costing function by:

- i. Making the conduct of an assessment of the efficient cost of teaching and research a required ATEC function, not one that the Minister may request ATEC to undertake.
- ii. Including research as an explicit element which ATEC must have regard to when undertaking the costing of teaching and learning.
- iii. Explicitly empowering ATEC to provide advice about student contributions.

### Recommendation 6:

Further the objective of building and maintaining research as a key national strength by amending the legislation so that research and research training are subjects on which ATEC must report, give advice, and have regard to in carrying out its functions.

## ATEC's remit

Current settings in Australian higher education have struggled to resolve several persistent, sector-wide issues. Barriers to access remain despite long-standing commitments to widening participation, and funding incentives have contributed to underinvestment in some fields while oversupplying others. Institutions have generally become more homogenous over time, reducing student choice and innovation. Universities' public obligations are often undercut by changeable resourcing, and geographic disparities continue to limit fair access, particularly for regional students who face significant challenges in where and how education is delivered.

Looking forward, the Universities Accord (the Accord) has proposed ambitious targets to increase the proportion of university-educated Australians aged 25 to 34 from 45% currently to 55% by 2050. To achieve this increase, the system will need to more than double the number of Commonwealth supported students in universities from 860,000 currently to 1.8 million by 2050. An increase of this scale cannot be absorbed by the sector as currently constituted.

Responding to these systemic issues requires a system-wide policy response. The Accord Final Report's recommendation was for the creation of an Australian Tertiary Education Commission – “an independent statutory authority answering to the Education and Skills Ministers, to enable it to provide robust advice and support evidence-based decision making and planning.”

ATEC's purposes, functions and outputs as proposed by the Accord are largely expressed in the legislation, and the University supports them. For example, the University supports the National Tertiary Education Objective (NTEO). We endorse the requirement that ATEC and the ATEC Commissioners must have regard to the NTEO, as well as the objective of improving outcomes for persons facing systemic barriers to education, in the performance of its functions.

The University sees value in ATEC's functions as set out in the legislation. These include negotiating mission based compacts with higher education providers to enable diversity of delivery and mission, consultation across the tertiary education system, steering the strategic direction, governance, size and diversity of the higher education system, the provision of advice to the Commonwealth and State and Territory higher education and VET ministers, and advising on opportunities to improve collaboration and coordination between the higher education and VET systems. The compact, in particular, is a vital tool for ATEC to steward the sector and shape systemic reform and re-adjustment.

In addition, we support the publication of a Statement of Strategic Priorities and work plan every two years and an annual State of the Tertiary Education System report. These publications will provide important roadmaps for the sector and advice to government. It is also prudent for there to be a review of the operation of the Act after two and five years of operation.

However, the Accord's vision is not realised in a several significant ways. Most significantly, the ATEC is not the independent statutory authority envisaged by the Accord. The University also has reservations about the level of resourcing and depth of expertise the legislation provides for ATEC.

The University considers that stewarding sectoral differentiation and specialisation may be difficult to achieve using the levers available to ATEC, and is concerned that without safeguards the relationship between it and the sector may become more directive than collaborative. Improvements could also be made to ensure ATEC is capable of robust data-gathering and an ongoing sophisticated and costing function. The legislation would also benefit from an increased emphasis on research.

## An independent ATEC

Independent statutory bodies such as the Australian Bureau of Statistics, the CSIRO, the Productivity Commission and the Australian National Audit Office all have reputations of international standing and have earned high levels of public trust. This is because they are afforded legislated independence from government and other agencies, meaning they can provide objective information and frank and fearless advice to government and the people of Australia.

A principal reason for creating an ATEC, rather than establishing similar functions within a department, is to create a body at arm's length from the executive. This means that it can act to further longer-term strategic goals for the sector, rather than being constrained by the day-to-day agendas of Government. It also enables the development of deeper expertise in higher education policy, with a longer-term perspective than an election cycle. The Accord identified the lack of deep thinking and long-term clarity of direction in the current system as a key weakness.

The Government has advised that its intention is for ATEC to be independent, with the Explanatory Memorandum stating: "Formal independence is a foundational element of the ATEC's design." We welcome this intention and acknowledge that there are positive aspects to the design. For example, the Minister must not give directions to ATEC Commissioners in relation to a higher education provider or a class or classes of higher education providers (s71(2)(c)). However, there are design features which will, in practice, substantially limit ATEC's independence.

### Limits on self-directed policy development

Under s11 a function of ATEC is to "report and publish information in relation to the tertiary education system and higher education providers," and to "undertake or coordinate research and data analysis in relation to any of the above [s11] functions." But the legislation makes clear that ATEC is only able to provide advice or recommendations to the Minister, if requested by the relevant Minister, and must seek and obtain the agreement of the Minister before publishing any such advice or recommendations (s69). The University believes that ATEC should also be able to undertake inquiries into important matters and publish research and proposals on its own initiative related to any matter covered in s41.

Empowering ATEC to initiate inquiries and develop and publish policy proposals would be an influential tool as part of its stewardship function. It would contribute positively to policy contestability in higher education, proffering high quality information and options into the public domain. The Government should retain the right to disregard ATEC's recommendations, but being in the public domain, they can be debated. As a broad model, the Productivity Commission, while primarily undertaking public inquiries at the request of Government, also has a program of self-initiated research. Jobs and Skills Australia is also permitted to publish across a wide range of matters to inform policy development and program delivery.

Further, ATEC will not publish an Annual Report, but instead submit content for consideration by the Secretary who will determine what is published (s72). If ATEC is to remain a branch of the Department, then this section should be amended such that the ATEC Chief Commissioner will provide content that the Secretary will be required to publish in the Department's Annual Report. It would be preferable for ATEC to publish an Annual Report in its own right.

### Constraints on recruitment

Another feature which limits ATEC's independence is that the ATEC Commissioners are to be classified as officials of the Department of Education for the purposes of the *Public Governance, Performance and Accountability Act* (PGPA Act), and staff assisting the ATEC are to be Department employees "made available" to ATEC by the Secretary. The Secretary of the Department is the Accountable Authority for the purposes of the PGPA Act. The inference seems to be that ATEC would not have sole discretion in recruiting its staff, notwithstanding that staff appointed in this way would be "subject to the directions of ATEC

Commissioners.” Further, contractors and consultants, many of whom would be sector experts, would be engaged under the terms and conditions determined by the Secretary.

By way of comparison, the Accountable Authority of the Productivity Commission for the purpose of the PGPA Act is the Productivity Commission Chair (s5(2)(b) of the *Productivity Commission Act*), and staff of the Productivity Commission are “officials of the Commission” (s5(2)(c)(iii)). The Productivity Commission is a “listed entity” for the purposes of the PGPA Act.

A stronger statutory separation between ATEC, the Department and the Minister would grant Commissioners full control over staffing decisions and allow staff to perform their roles without being (or being perceived to be) under the ultimate authority of the Secretary.

The Bill states that the Minister may terminate the appointment of an ATEC Commissioner if they are satisfied that the Commissioner’s performance has been unsatisfactory for a significant period of time. An excessively interventionist Minister could use this power to constrain the voice of Commissioners. By way of contrast, it is the Governor-General, not the Minister, who has the power to terminate the employment of a Productivity Commissioner in certain proscribed circumstances.

### **Ensuring ATEC accountability**

An independent ATEC would still remain democratically accountable. We note that under the legislation ATEC must take into account any short- or long-term priorities advised of by the Minister when performing its functions, including taking them as “a key input” in preparing its Statement of Strategic Priorities. Noting that we understand this to mean that the Minister’s directions are not determinative, this will nonetheless be an important means of maintaining accountability. We note also that the Minister may give written directions to ATEC about the way in which it carries out its functions, with important carve outs including not giving directions with regards to particular providers/classes of providers. This will also be a way of maintaining accountability. Importantly, ATEC should be required to appear before Senate Estimates.

#### **Recommendation 1:**

*Bolster ATEC’s independence by:*

- i. Explicitly granting ATEC authority to initiate inquiries and make and publish policy reports with recommendations without specific Ministerial direction or veto.*
- ii. Establishing a more decisive statutory separation of the ATEC from the management structures of the Department of Education and the Minister, including that ATEC has sole discretion in its recruitment.*
- iii. Ensuring the ATEC Commissioner has ultimate authority over Annual Report content.*

## **An ATEC that is sufficiently resourced to deliver its mission and develop deep expertise**

### **Access to expertise**

One of ATEC’s key functions — negotiating mission based compacts — will be among its largest, most complex activities. Universities have very different goals, missions, strategic plans, geographic locations and local communities. If mission based compacts are to encourage system diversity while at the same time moving the sector towards overarching strategic priorities, they will need to be negotiated with a deep understanding of the particularities of each university. Under the current legislation, responsibility for compacts would be overseen by just two full-time Commissioners and one part-time Commissioner.

The University welcomes the clear intention expressed in the legislation that Commissioners should be people with deep expertise in the tertiary education sector, and that they should “collectively possess an appropriate balance of experience and knowledge in fields relevant to the ATEC.”

ATEC’s credibility will in large part rest on the quality and coherency of its advice and decisions, and these will rest on the quality of evidence that informs them, including existing tertiary education system data sets. It will be imperative that ATEC is also resourced to maintain an in-house robust and unimpeachable data gathering capability.

However, the ATEC’s ability to host genuine expertise will be limited in a number of ways. Given the breadth of ATEC’s responsibilities and the number of providers with which ATEC will need to develop strong relationships, it is doubtful that two full-time Commissioners and one part-time Commissioner, supported by delegated Department of Education staff, will be sufficient. If ATEC is to be successful, provision should be made for the Minister to have discretion to appoint additional Commissioners. By way of comparison, the Productivity Commission has ten commissioners and does not have a stewarding capacity.

In addition, ATEC’s expertise may be limited by what appears to be a concern about sectoral capture, with all Commissioners required to have “appropriate independence from all tertiary education providers.” This includes the part-time Commissioner. The exact meaning of “appropriate independence” is not given in the legislation. While it is essential that conflicts of interest are prevented, given that deep expertise in the sector will be required in these roles, this requirement should not be interpreted too broadly. We would expect people of this standing would also be highly professional and capable of managing any conflicts that may arise, supported by appropriate conflict of interest policies and the provisions in the Bill.

The Accord explicitly identified a decline in capability and capacity within the Department as a key system-level concern. If the legislation results in simply transferring existing departmental staff into ATEC, this is unlikely to address this underlying issue and risks perpetuating the very capability gaps the Accord sought to remedy. ATEC will need to be sufficiently resourced and have sufficient control over its budget to hire the staff necessary to meet its purpose, carry out its functions, and produce its required outputs.

Beyond direct recruitment, formal mechanisms such as secondments, short-term placements and policy fellowships between higher education providers and the ATEC could help build institutional expertise and strengthen mutual understanding. This should fall under ATEC’s authorisation.

### **Taking on the functions of the Higher Education Standards Panel**

A number of ATEC’s functions are not currently performed by the Department, including the production of an annual State of the Tertiary Education System report and the functions of the existing Higher Education Standards Panel (HESP).

Currently the HESP is required to have a panel Chair and between four and ten other members. The HESP performs a highly technical role providing independent advice to the responsible Minister(s) on how to maintain the quality and standards of Australia’s higher education system. This includes making or varying the Higher Education Standards Framework (Threshold Standards) and providing recommendations to TEQSA on various matters. In December 2025 there are eight HESP members including the Chair with a range of expertise, all drawn from the sector.

It would be a retrograde step to move responsibility for the design of the Threshold Standards from an independent panel of sector experts who are mostly university staff (the HESP) to a body that, in practice, may not be sufficiently resourced or independent. In addition, while membership of the HESP requires expertise in the development of quality standards, no such requirement is specified in the criteria for ATEC Commissioners. While the University acknowledges that the sector has faced governance challenges, a move away from the current principles and risk-based framework would be problematic.

The Explanatory Memorandum suggests that an advisory committee may be formed to advise on the Threshold Standards under s25(2) of the principal bill. Under the legislation ATEC must ensure that members of advisory committees which it establishes “have appropriate knowledge or experience.” However, there is no requirement that members be independent and drawn from the sector. A Threshold Standards advisory committee should be mandated in the legislation, similar to the First Nations Advisory Committee. Such a body should also be required to include members which “collectively have contemporary experience in the provision of higher education by higher education providers that are universities and that are not universities,” as is the case currently with HESP.

### **Recommendation 2:**

*Ensure ATEC is resourced to achieve its mission by:*

- i. Providing for the Minister to appoint additional Commissioners.*
- ii. Ensuring that the definition of “appropriate independence”, does not exclude eminent people with recent high-level experience in tertiary education from being eligible to be appointed as a Commissioner. For part-time Commissioner roles, allow current relationships to the tertiary sector, as long as the part-time Commissioner declares these and recuses themselves from any decisions which specifically affect entities with which they have a relationship.*
- iii. Providing ATEC with sufficient staffing budget and autonomy on all hiring decisions.*
- iv. Enabling ATEC to take on secondments, short-term placements and policy fellowships from the sector, with sole discretion on selection and recruitment.*
- v. Requiring the establishment of a Threshold Standards advisory committee which includes members with relevant expertise drawn from the sector.*

## **An ATEC that is equipped to more effectively support universities to differentiate and specialise**

To meet the Accord’s ambitions, the higher education system needs to deliver a broad spectrum of education options and outcomes to a larger, more heterogeneous and more motivationally-diverse cohort of students than ever before. The spectrum of educational outcomes must range from critical, analytical, complex problem-solving capabilities to professional and technical capabilities.

A fundamental redesign of the current system, which makes the best use of resources, must reduce the duplication among universities while maximising student choice and outcomes. Rather than a one-size-fits-all system, the sector needs to move towards a varied tertiary education ecosystem differentiating between teaching-intensive, research-intensive and vocational training institutions, with students able to move between these options.

Under the legislation, mission based compacts will be the primary means by which ATEC stewards the higher education system. It is intended that compacts will comprise two interrelated components: mission alignment and load allocation. Decisions made by ATEC about future student load allocations (i.e. the distribution of Commonwealth Supported Places and eventually international student commencements) will be informed by provider performance against agreed objectives within the compacts. This means that load allocation will become the leading lever through which ATEC will steward the sector.

Load allocation is a fairly blunt tool with which to steward systemic change. By contrast, the Ontario Government’s Strategic Mandate Agreements with publicly assisted colleges and universities provides both operating funding based on enrolments and additional funding tied to performance to support system differentiation.

Offering additional, more targeted incentives for specific activities or mission transition would strengthen ATEC’s ability to drive system diversity and specialisation. Competitive funding could, for example, be

directed to activities aligned with strategic priorities such as regional engagement, industry-integrated learning, alternative credential structures aligned with workforce needs, applied research, or the expansion of campuses, learning hubs or faculties in underserved areas or fields. An alternative would be to enable ATEC to make recommendations to the Minister about such funding, with the decision remaining with Government.

**Recommendation 3:**

*Expand ATEC's functions so it can more actively assist universities to differentiate and specialise, including affording it the authority to allocate structural adjustment funding, or to provide advice to the Minister on its allocation.*

## **An ATEC that exercises stewardship collegiately with the sector**

The explicit linkage of institutional missions with load allocation presents risks to the ATEC-university relationship if not carefully managed. Without appropriate safeguards, this mechanism could transform ATEC's role from collaborative partner to directive regulator or even coercive instrument of Government.

In the event a compact cannot be agreed and ATEC “reasonably believes that the provider is not participating in the negotiations in good faith”, a default compact is imposed. ATEC can also suspend a compact in certain circumstances, including where it believes that a provider has failed to meet a term of the compact or failed to provide certain information to ATEC, in which case a default compact will also be imposed. There are no provisions for appeal in the compact negotiation or merits review when ATEC suspends a compact.

It should also be noted that if ATEC reduces a university's load allocation due to provider performance against compact objectives, the impact would extend beyond the university. There will be prospective students who do not receive offers who otherwise would have, but for the load reduction – an undesirable outcome both for the individual and for the goal of increasing the number of Australians with a university education.

The legislation states that, if a default compact is imposed due to suspension of a mission based compact, “ATEC may consider the terms of the provider's mission based compact and whether the default mission based compact should contain the same terms.” This should be amended to state that ATEC must include the same terms. This would reduce the impact on students, while still incentivising providers to conclude negotiations to access additional student places and funding.

A collaborative ATEC-university relationship represents the optimal framework for achieving positive sectoral and student outcomes. This objective would be substantially advanced through legislative definition of ‘system stewardship’. The absence of a statutory definition of what policy documents have previously described as ATEC's overarching function creates uncertainty about ATEC's relationship to the sector. It means that ‘stewarding’ could, in practice, emphasise penalties over incentives, positioning ATEC as a regulator and confusing its relationship with TEQSA.

**Recommendation 4:**

*Encourage an ATEC that works collegiately with the sector by:*

- i. Ensuring that a default compact must include the same terms that were in the most recent mission based compact.*
- ii. Defining “national sector stewardship” in the legislation in a way that makes clear that ATEC does not have a regulatory relationship with the sector.*

## **An ATEC empowered to carry out a sophisticated costing function**

### **Mandated responsibility for costing exercises**

It is widely acknowledged that the Job-Ready Graduates (JRG) program has failed, with the Accord Final Report calling for its “urgent remediation.” JRG cut overall funding for domestic students by 6 per cent and created an inequitable funding split between government and students, with student contributions varying from 13 per cent to 93 per cent of the total price. Despite its stated aim of making study in national priority areas more attractive, JRG has had no clear effect on student choices. At the same time, funding increased for some non-priority courses while falling for priority areas, producing perverse incentives for universities. High student contributions for certain courses have also disproportionately impacted low SES students, Indigenous students and women.

An understanding of the full cost of teaching and learning, incorporating all direct and underlying inputs, is essential to designing a replacement for JRG and to ensuring the long-term sustainability of the sector.

The most recent government costing exercise was led by Deloitte, whose Transparency in Higher Education Expenditure report (June 2022) contained several important shortcomings. These included overlooking capital investment in teaching and research infrastructure and the ongoing cost of maintenance, for which universities no longer receive explicit funding. Additionally, Deloitte itself acknowledged in the report that “there is concern that contextual factors may mean that two equally efficient universities could have very different costs, reflecting differences in context, strategic objectives and teaching methods.” Accurately assessing teaching costs is further complicated by cross-subsidies between teaching and research and revenue from different sources, including international student fees, which can obscure the true marginal and fixed costs of provision.

Under the legislation ATEC may provide advice to the Minister on the costs of teaching and learning in higher education on request. Rather than leaving costing exercises to Ministerial discretion – something that the Minister ‘may request’ – ATEC should have a mandated responsibility for the ongoing conduct of an efficient cost of teaching and learning assessment.

### **Inclusion of research in costings**

Importantly, the cost of research should be included in the ATEC’s definition of ‘teaching and scholarship costs’. Research is one of the underlying inputs that contributes to the true cost of teaching and learning.

The Provider Category Standards set specific research expectations for universities. Universities are required to undertake research in at least three or half of the broad fields of education in which they deliver courses of study. Universities are also required to demonstrate “scholarly activities and outcomes that inform teaching, learning, and professional practice and make a contribution to the advancement and dissemination of knowledge.” Consequently, teaching costs cannot be entirely separated from research, as research is fundamental to teaching.

In addition, competitive research grants do not fully fund the cost of research. As the Strategic Examination of Research and Development has noted, competitive R&D grant funding for Australian universities increased by 140% from 2001 to 2022 in real terms. In contrast, funding for the indirect costs (such as administration, utilities, maintenance, taxes) of R&D grew by only 49% over the same period. Universities must make up the difference through other revenue, including teaching. In this context it is notable that the ATEC legislation, in describing the costing functions ATEC may be asked to perform, does not explicitly refer to research.

## Advice on student contributions

Under the legislation, ATEC may also be asked to advise on Commonwealth contribution amounts for places in funding clusters. Notably there is no specific provision empowering ATEC to provide advice on student contributions. While advice on teaching costs and Commonwealth contributions would, in effect, involve implied advice on student contributions, the legislation should be amended to make this authority explicit.

### **Recommendation 5:**

*Empower ATEC to carry out a sophisticated costing function by:*

- i. Making the conduct of an assessment of the efficient cost of teaching and research a required ATEC function, not one that the Minister may request ATEC to undertake.*
- ii. Including research as an explicit element which ATEC must have regard to when undertaking the costing of teaching and learning.*
- iii. Explicitly empowering ATEC to provide advice about student contributions.*

## An ATEC which helps build and maintain research as a key national strength

While the legislation identifies enabling internationally competitive research and research training as an object of the legislation, the practical focus is weighted towards teaching and learning.

As the Strategic Examination of Research and Development process recognised, Australia's university research is world-leading and a key national strength. To ensure this remains the case, providing advice and recommendations in relation to higher education research policy should be made an explicit function of ATEC. Including specific reference to trends in research output and quality in the section of the legislation relating to the State of the Tertiary Education System would also be appropriate.

ATEC should also have an obligation to have regard to the objective of enabling internationally competitive research and research training.

### **Recommendation 6:**

*Further the objective of building and maintaining research as a key national strength by amending the legislation so that research and research training are subjects on which ATEC must report, give advice, and have regard to in carrying out its functions.*

# The University of Melbourne

Grattan Street, Parkville, Victoria 3010 Australia

t 13 MELB (13 6352)

+61 3 9035 5511 (International)

[unimelb.edu.au](http://unimelb.edu.au)



THE UNIVERSITY OF  
MELBOURNE